## UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 0:16-CV-61511-WJZ

CAROL WILDING, et al.,

Plaintiffs,

V.

DNC SERVICES CORP., d/b/a
DEMOCRATIC NATIONAL COMMITTEE,
et al.,

Defendants.

## DECLARATION OF PATRICE TAYLOR IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS FIRST AMENDED COMPLAINT

Pursuant to 28 U.S.C. § 1746, I, Patrice Taylor, declare as follows:

- 1. My name is Patrice Taylor. I am over the age of 18, have personal knowledge of the facts stated in this declaration, and can competently testify to their truth.
- 2. I am the Director of Party Affairs at the Democratic National Committee (the "DNC"). I have held this position since June 2009. Prior to that, I worked in the DNC's Party Affairs Department as a Deputy Director from June 2006 to June 2009. Prior to that, I worked in the DNC's Research Department from September 2005 to June 2006.
- 3. Among my many duties as Director of Party Affairs is to oversee the Party's research into and compilation of the various ways in which each U.S. jurisdiction conducts its presidential nominating process, whether through a primary or a caucus. As part of this, we research and compile information about each state's elections process, which includes party registration, together with other aspects of how each jurisdiction conducts its presidential nomination process.
- 4. During presidential years, I also am responsible for managing the delegate selection process for the Democratic National Convention. As part of my duties in that role, I

work with state Democratic parties across the country to explain how the process works and to ensure that it is conducted openly and fairly so that every Democrat can have their voice heard.

- 5. The Democratic Party has long selected its presidential nominee based on a majority vote of the delegates to the Party's national convention. Delegates attended the Convention in delegations from each of the fifty United States, as well as the District of Columbia, Guam, American Samoa, the Northern Marianas, Puerto Rico and the U.S. Virgin Islands. In August 2014, each of these jurisdictions were allotted a number of delegates based on population and a number of other factors. Although the process for assigning these allotted delegates to candidates varies from jurisdiction to jurisdiction, our rules require that all delegates be proportionally allocated.
- 6. This year, from the time the first voters cast their ballots in the Iowa Democratic primary on February 1, 2016, until June 14, 2016, when the last of the Democratic primary contests in this election cycle was held in the District of Columbia, over 27 million voters participated in the process by which the Party's presidential nominee is chosen. Of those voters, it has been reported to the DNC that a total of 15,805,136 voted for former Secretary of State Hillary Clinton and 12,029,699 voted for Senator Bernie Sanders.
- 7. Although DNC rules require that, to participate in the delegate selection process to nominate the Party's candidate for president, a voter must have "publicly declar[ed] their Party preference [as a Democrat] and have that preference publicly recorded," such as by registering with the appropriate authorities in their state as a Democrat (where available), the DNC is not itself responsible for Party registration at any level. There is not a national Democratic Party registration system. Party registration, like voter registration, is a local matter, handled by each of the U.S. states and territories locally. In some jurisdictions—though not all—the state political parties may also have a role in maintaining party registration. But, while many states permit voters to register with a political party upon registering to vote with the appropriate state authority responsible for handling voter registration, several do not have party registration at all. In states without party registration, individuals who identify as Democrats might join their

state, county, or city Democratic Party committees, but those voters tend to be in the minority. The vast majority of voters who identify with a political party may have no interaction with the party except as reflected by their voting history.

I declare the foregoing to be true and correct under penalty of perjury.

Signed in Washington, DC on September 21, 2016.

Detrice Taylo